

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

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COMPANY DOE,

*

Plaintiff

vs.

*

Civil No.: _____

INEZ TENENBAUM, in her official capacity
as Chairwoman of the Consumer Product Safety
Commission, and the CONSUMER PRODUCT
SAFETY COMMISSION

*

4330 East West Highway,
Bethesda, MD 20814

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Defendants

*

MOTION FOR LEAVE TO SEAL CASE AND TO PROCEED UNDER A PSEUDONYM

Plaintiff, by and through its attorneys of record, respectfully requests this Court to enter an Order requiring that all pleadings, documents, and forms be filed under seal pursuant to Rule 105.11 of the Local Rules of the United States District Court for the District of Maryland. Plaintiff also seeks an order allowing it to proceed under the pseudonym “Company Doe.” Plaintiff seeks this order sealing documents and to proceed under a pseudonym in order to prevent the disclosure of baseless allegations about the Plaintiff, the disclosure of which would violate Defendant’s statutory mandate and accompanying regulations and would cause irreparable harm to the Plaintiff.

The documents which Company Doe currently seeks to file under seal are: the civil cover sheet, the complaint, the certification of service, the corporate disclosure statement, the motion for one of plaintiff's attorneys to appear pro hac vice, the summons, and any exhibits to the above-mentioned motions. Company Doe seeks to have all documents filed by any party to this matter be filed under seal.¹

A memorandum in support of this motion is enclosed.

Respectfully Submitted,

Dated: October 17, 2011



BARUCH FELLNER

DANIEL J. DAVIS, Bar No. 28542
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue N.W.
Washington, District of Columbia 20036
Telephone: (202) 955-8591
Facsimile: (202) 530-9546

RAYMOND G. MULLADY, JR, Bar No. 02732
BLANK ROME LLP
Watergate 600 New Hampshire Avenue N.W.
Washington, District of Columbia 20037
Telephone: (202) 772-5828
Fax: (202) 572-8414

Attorneys for Plaintiff
COMPANY DOE

¹ In the event that the Court does not grant the motion to seal the documents, Plaintiff requests the opportunity to refile all of its documents in anonymous form. In the event that Plaintiff is not granted leave to file documents under seal or to proceed under the pseudonym Company Doe, Plaintiff requests the opportunity to consider the withdrawal of its filings.